

August 30, 2021

BY HAND DELIVERY AND ELECTRONIC MAIL

Luly E. Massaro, Commission Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

RE: Docket 5164 – Responses to PUC Set 3 Data Requests

Dear Ms. Massaro:

On behalf of The Narragansett Electric Company d/b/a National Grid (“Company”), I have enclosed nine copies of the Company’s responses to the Third Set of data requests of the Public Utilities Commission (“Commission”) on the Company’s RE Growth Program Factor filing, for the period April 2021 through March 2022.

Consistent with the instructions issued by the Commission on March 16, 2020, and updated on October 2, 2020, this filing is being made electronically. Nine (9) hard copies will be submitted to the Commission within twenty-four (24) hours, with four (4) hard copies being three-hole punched.

Thank you for your attention to this matter. If you have any questions, please contact me at 781-907-2126.

Very truly yours,



Laura C. Bickel
RI Bar # 10055

Enclosures

cc: Docket No. 5164 Service List
Jon Hagopian, Esq., Division of Public Utilities and Carriers
John Bell, Division of Public Utilities and Carriers
Albert Vitali, Esq., Office of Energy Resources
Cynthia Wilson-Frias, Esq., Public Utilities Commission

Certificate of Service

I hereby certify that a copy of the cover letter and any materials accompanying this certificate was electronically transmitted to the individuals listed below. The paper copies of this filing are being mailed to the Rhode Island Public Utilities Commission and to the Rhode Island Division of Public Utilities and Carriers.



Date: August 30, 2021

Laura C. Bickel

**Docket No. 5164 – Renewable Energy Growth Factor Filing (Program Year 2021
 Service List updated 7/16/2021**

Parties' Name/Address	E-mail	Phone
Laura Bickel, Esq. Celia O'Brien, Esq. National Grid 280 Melrose Street Providence, RI 02907	Laura.bickel@nationalgrid.com;	781-907-2121
	Jennifer.Hutchinson@nationalgrid.com;	
	Laurie.Riley@nationalgrid.com;	
	Brooke.skulley@nationalgrid.com;	
	Joanne.scanlon@nationalgrid.com;	
	Ian.springsteel@nationalgrid.com;	
	Jayson.Uppal@nationalgrid.com;	
	Jason.Small@nationalgrid.com;	
	Jorge.Sousa@nationalgrid.com;	
	Thomas.Kender@nationalgrid.com;	
	Daniel.Gallagher@nationalgrid.com;	
Scott.McCabe@nationalgrid.com;		
Theresa.Burns@nationalgrid.com;		
Jon Hagopian, Sr. Counsel Division of Public Utilities and Carriers	Jon.hagopian@dpuc.ri.gov;	401-784-4775
	John.bell@dpuc.ri.gov;	
	Margaret.L.Hogan@dpuc.ri.gov;	
	Al.contente@dpuc.ri.gov;	
Mike Brennan 500 North Boundary St. Raleigh, NC 27604	mikebrennan099@gmail.com;	919-219-2957
Luly E. Massaro, Commission Clerk Cynthia Wilson-Frias, Commission Counsel Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888	Luly.massaro@puc.ri.gov;	401-780-2107
	Alan.nault@puc.ri.gov;	
	Todd.bianco@puc.ri.gov;	
	Cynthia.WilsonFrias@puc.ri.gov;	
	Emma.rodvien@puc.ri.gov;	
Rudolph.S.Falcone@puc.ri.gov;		

Office of Energy Resources	Albert.Vitali@doa.ri.gov ;	
	Nancy.Russolino@doa.ri.gov ;	
	Christopher.Kearns@energy.ri.gov ;	
	Nicholas.ucci@energy.ri.gov ;	
	Carrie.Gill@energy.ri.gov ;	
	Jacklyn.Olivieri@energy.ri.gov ;	
	Shauna.Beland@energy.ri.gov ;	

The Narragansett Electric Company
d/b/a National Grid
RIPUC Docket No. 5164
IN RE: The Narragansett Electric Company
d/b/a National Grid 2021 Renewable Energy
Growth Program Factor Filing
Responses to Commission's Third Set of Data Requests
Issued on August 16, 2021

PUC 3-1

Request:

On page 4 of Schedule NG-2, National Grid forecasts Forward Capacity Market proceeds from REG facilities during the program year ending March 2022 to be \$44,463. In the Annual Forward Capacity Market Performance Report filed on July 29, 2021 (Docket No. 4676), National Grid forecasts Forward Capacity Market base revenue for REG facilities during CCP 12 to be \$42,147. (Staff arrived at this number by adding up the "Total Revenue" values for all REG facilities included in Table 3 of the Report.) Please explain the difference between these two numbers.

Response:

Page 5 of 6 of Schedule NG-2 from the Company's Docket No. 5164 RE Growth Factor Filing shows estimated 2021 revenue for RE Growth facilities enrolled in the FCM as \$44,463. In the Annual FCM Performance Report, Resource ID 40632, identified as DGSC (also known as LTCRER), is located after the first three RE Growth projects. The estimated total revenue for this resource during 2021 is \$2,315. After removing that value, the total RE Growth estimated revenue changes from \$44,462 to \$42,147. The components of the estimated revenue for Summer 2021¹ from the 2021 Annual FCM Performance Report are:

DGSC:	\$155,956
<u>RE Growth:</u>	<u>\$42,147</u>
Total:	\$198,103

¹ Please note that at the time that the Annual FCM Performance Report was filed, the Company had actual Monthly Reconfiguration Auction (MRA) clearing prices for June, July, and August 2021. The September 2021 MRA had not yet occurred, and the Company used a proxy clearing price. Also, not all resources participate in MRAs.

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d/b/a National Grid
RIPUC Docket No. 5164
IN RE: The Narragansett Electric Company
d/b/a National Grid 2021 Renewable Energy
Growth Program Factor Filing
Responses to Commission's Third Set of Data Requests
Issued on August 16, 2021

PUC 3-2

Request:

Referencing the Annual Forward Capacity Market Performance Report filed on July 29, 2021 (Docket No. 4676), please explain the following regarding REG facilities listed in Table 2 (FCM Capacity Base Revenue Earned for CCP 11):

- a. Why do the following facilities have unlisted CSOs, and what does that listing mean for their ability to have participated in monthly reconfiguration auctions in CCP 11?
Facilities with Resource IDs: 40657, 40660, 40661, 40662, 40663, 40665, 40669, 40671, 40672, 40673, 40674, 40677, 40679, 40680, 40682, 40694, 40697, 40701, 40702.
- b. Why do facilities with Resource IDs 41026 and 41031 have their CSOs listed as zero, and what does that mean for their ability to have participated in monthly reconfiguration auctions in CCP 11?
- c. For the purposes of market participation, what is the difference between a resource being listed in the Annual Forward Capacity Market Performance Report with a CSO of zero versus having an unlisted CSO?

Response:

- a. These facilities were included in the master list of projects and thus the report. These facilities do not have a CSO because they did not complete qualification, and thus were not able to take on an obligation during these monthly reconfiguration auctions.
- b. The Company initially sought qualification for Resource IDs 41026 and 41031 in 2019 for FCA 14. However, it appears that these resources were delayed in their construction or interconnection timelines. The Company's strategy for determining whether to enroll a project was that it had to be interconnected by the time the qualification window would have closed in 2019, in order to avoid committing financial collateral, called Financial Assurance, to ISO-New England, Inc. before a resource was operational. Thus, although these resources are not active projects in the FCM, they are still resources.
- c. For CCP 11, Table 2, a blank field means that a resource could not take on a CSO and a zero means that the Company chose not to take on a CSO, due to expected performance.

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PUC 3-3

Request:

Referencing the Annual Forward Capacity Market Performance Report filed on July 29, 2021 (Docket No. 4676), please explain the following regarding REG facilities listed in Table 3 (Forecasted FCM Capacity Base Revenue for CCP 12):

- a. What is the significance of the following facilities having had unlisted CSOs in Table 2 but CSOs listed as zero in Table 3? Facilities with Resource IDs: 40657, 40660, 40661, 40662, 40663, 40665, 40669, 40671, 40672, 40673, 40674, 40677, 40679, 40680, 40682, 40694, 40697, 40701, 40702.
- b. For the REG facilities listed in Table 3 with a CSO of zero, what does that listing mean for their ability to participate in monthly reconfiguration auctions in CCP 12?

Response:

- a. These facilities were included in the master list of projects, and thus the report. These facilities do not have a CSO because they did not complete qualification, and thus were not able to take on an obligation during these monthly reconfiguration auctions. In this case, a zero CSO means either that resources could not take on a CSO or the Company chose not to take on a CSO due to expected performance. For the resources that did not complete qualification, their CSO should have been a blank field to match the CCP 11, Table 2.
- b. For CCP 12, Table 3, a zero CSO means either that the resource could not take on a CSO or that the Company chose not to take on a CSO, due to expected performance.